

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

MAR 01 1989

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BY TELEFAX and
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RETURN RECEIPT REQUESTED P-545 546 733

Mr. H. Gilbert Weil
Union Carbide Corporation
P.O. Box 670
Bound Brook, New Jersey 08805

Re: SCP-Carlstadt Site, Administrative Orders Index Nos. II-
CERCLA-50114 and II-CERCLA-60102

Dear Mr. Weil:

This is to confirm the February 27, 1989 discussion between you and Janet Feldstein, of my staff, during which Janet clarified EPA's position regarding the pumping test which was conducted by Dames & Moore in the Bedrock well recently installed at the SCP-Carlstadt Site.

As you are aware, Respondents to the above-referenced Orders submitted a revision to the Project Operations Plan ("POP Revision No. 9"), which described the procedures Dames & Moore would utilize to install, collect samples from, and test one or more wells in the Bedrock aquifer at the site. EPA provided Respondents with comments on the proposed POP Revision No. 9, and Dames & Moore agreed to incorporate EPA's comments into the work to be performed.

It has come to my attention that, in the course of scheduling the pumping test, Dames & Moore has suggested deviating from the approved POP Revision No. 9. Specifically, they have proposed that the water level measurements be taken in the observation wells at less frequent intervals than those specified in the POP Revision. In addition, Dames & Moore has proposed to collect water level measurements in only five of the Till aquifer wells, as opposed to all of the Till wells, as specified in the POP Revision.

On February 23, 1989, during discussions with Janet Feldstein, of my staff, Gerard Coscia, of Dames & Moore, made it clear that the proposed deviations are warranted based on the limited scope of the test. EPA had previously expressed concern about the pumping test duration, and the quality of the data one could expect to receive from such a short test. Mr. Coscia pointed out that the objective of the work proposed in POP Revision No. 9 (as stated on Page 1 of the September 30, 1988 document) was to "provide information related to the subsurface geology and aquifer characteristics in the vicinity of the monitoring well". (emphasis added)

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information related to the subsurface geology and aquifer characteristics in the vicinity of the monitoring well".
(emphasis added)

Elsewhere in the POP Revision it is stated that the pumping test will provide information regarding the interconnection between the Till and Bedrock aquifers (see pages 2 and 7). I would like to clarify that the results of the limited pumping test (only 24 hours in duration) can not be utilized to demonstrate conclusively the interconnection, or lack thereof, between the Till and Bedrock aquifers. Obviously, a demonstrated response in the Till aquifer during pumping of the Bedrock well would indicate an interconnection of the aquifers. However, the converse is not necessarily true: a lack of response in the Till aquifer will not prove that the aquifers are not interconnected.

Dames & Moore has made clear to my staff that in order to demonstrate conclusively the interconnections and effects upon the Bedrock aquifer, additional Bedrock wells will be installed, and additional testing will be necessary at a later date.

EPA does not object to Dames & Moore's proposed deviations from the POP Revision considering that Dames & Moore does not intend to utilize the data from the pumping test to draw broad conclusions regarding the interconnection between the Till and Bedrock aquifers.

If you have any questions regarding this matter, please contact Janet Feldstein at (212) 264-0613.

Sincerely yours,

Raymond Basso, Chief
New Jersey Compliance Branch

cc: Tom Armstrong, General Electric
William L. Warren, Esq.
Pamela Lange, NJDEP
Harry Yeh, EBASCO

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<p>3. Article Addressed to:</p> <p>MR. H. GILBERT WEIL UNION CARBIDE CORP. P.O. BOX 670 BOUND BROOK, NJ 08805</p>	<p>4. Article Number</p> <p>P-545 546 783</p> <p>Type of Service:</p> <p><input type="checkbox"/> Registered <input type="checkbox"/> Insured <input type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail</p> <p>Always obtain signature of addressee or agent and DATE DELIVERED.</p>
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